

# Exhibit A

STATE OF MICHIGAN  
IN THE CIRCUIT COURT FOR THE COUNTY OF DELTA

ALYSSA M. GUINDON,

Plaintiff,

vs.

Case No. 19-24184-NI  
Hon. John B. Economopoulos

WILLIAM M. DEBROUX and  
J. B. HUNT TRANSPORT, INC.,  
A Foreign Profit Corporation,

Defendants.

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Jessica A. Bray (P58972)  
Attorney for Plaintiff  
Bray, Cameron, Larrabee & Clark, P.C.  
225 Ludington Street  
Escanaba, MI 49829  
(906) 786-3902

Dirk H. Beckwith (P35609)  
Attorney for Defendants  
Foster, Swift, Collins & Smith, P.C.  
28411 Northwestern Highway, Ste. 500  
Southfield, MI 48034  
(248) 539-9918

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**PLAINTIFF'S ANSWERS TO DEFENDANTS INTERROGATORIES  
AND REQUESTS TO ADMIT TO ALYSSA M. GUINDON**

Now comes Plaintiff, ALYSSA M. GUINDON, by and through her attorneys, Bray, Cameron, Larrabee, & Clark, P.C., and answering Defendants Interrogatories and Requests to Admit to Alyssa M. Guindon, states as follows:

**ANSWERS TO INTERROGATORIES**

1. Is Plaintiff claiming damages, exclusive of interest and costs, in excess of \$75,000.00?

**ANSWER:** Plaintiff believes damages could be in excess of \$75,000.00 After examination and investigation into the facts and circumstances of the accident and the treatment and the injuries to this plaintiff, the best estimate is that the damages are in excess of \$75,000.00, and the loss is ongoing.

2. Has Plaintiff sustained damages, exclusive of interest and costs, in excess of \$75,000.00?

**ANSWER:** See attached Medical CD. Plaintiff believes damages could be in excess of \$75,000.00. After examination and investigation into the facts and circumstances of the accident and the treatment and the injuries to this plaintiff, the best estimate is that the damages are in excess of \$75,000.00, and the loss is ongoing.

3. Describe the nature and extent of Plaintiff's alleged damages.

**ANSWER:** See attached CD of medical records. Damages include, but are not limited to, skull fractures with a head injury requiring treatment by multiple sources and extensive recovery with permanent damages including hearing loss.

4. Was Plaintiff hospitalized as a result of the incident that occurred on September 20 or 21, 2018? If so, where was Plaintiff hospitalized and for how many days was Plaintiff in the hospital?

**ANSWER:** Yes. See attached CD of medical records but Plaintiff was hospitalized for about 2 days.

5. Did Plaintiff undergo any surgical procedures as a result of the incident that occurred on September 20 or 21, 2018? If so, describe the surgical procedures Plaintiff underwent.

**ANSWER:** No.

6. Did Plaintiff seek any medical treatment as a result of the incident that occurred on September 20 or 21, 2018? If so, what is the total amount of Plaintiff's medical expenses that have been incurred to date?

**ANSWER:** Yes. Medical expenses are unknown as they were and are being paid by the no-fault carrier. A release for that information will be signed if requested.

7. Did Plaintiff miss any time from work as a result of the incident that occurred on September 20 or 21, 2018? If so, what is the total amount of Plaintiff's alleged lost wages incurred to date and when did Plaintiff return to work?

**ANSWER:** Yes. Plaintiff was completely off of work until Mid-November, 2018. Plaintiff then went back to work part time until being released back to work full time on January 2, 2019.

**ANSWERS TO REQUESTS TO ADMIT**

1. Admit Plaintiff claims she sustained damages, exclusive of interest and costs, in an amount in excess of \$75,000.00.

**ANSWER:** Plaintiff admits that she sustained damages that could be in excess of \$75,000.00. After examination and investigation into the facts and circumstances of the accident and the treatment and the injuries to this plaintiff, the best estimate is that the damages are in excess of \$75,000.00, and the loss in ongoing.

2. Admit Plaintiff claims she sustained damages, exclusive of interest and costs, in an amount less than \$75,000.00.

**ANSWER:** Plaintiff denies that the damages are less than \$75,000.00. After examination and investigation into the facts and circumstances of the accident and the treatment and the injuries to this plaintiff, the best estimate is that the damages are in excess of \$75,000.00, and the loss in ongoing.

BRAY, CAMERON, LARRABEE  
& CLARK, P.C.

Dated: May 24, 2019.

By: Jessica A. Bray  
Jessica A. Bray  
Attorney for Plaintiff  
225 Ludington Street  
Escanaba, MI 49829  
(906) 786-3902

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PROOF OF SERVICE

STATE OF MICHIGAN]  
[ ss.  
COUNTY OF DELTA ]

The undersigned deposes and states that she served documents as follows:

1. Served: Plaintiff's Answers to Defendant's Interrogatories and Requests to Admit to Alyssa M. Guindon
2. Served Upon: Dirk H. Beckwith  
Attorney at Law  
28411 Northwestern Highway, Ste. 500  
Southfield, MI 48034
3. Served By: U.S. Mail
4. Date Served: May 24, 2019.

Lisa M. Rian  
Lisa M. Rian

Subscribed and sworn to before me  
this \_\_\_\_ day of May, 2019.

Lorraine S. Gregg  
Lorraine S. Gregg, Notary Public  
Delta County, Michigan  
My commission expires: 10/21/2021